

Baker & Hostetler LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Dean D. Hunt
Lan Hoang
Seanna R. Brown

Hearing Date: December 3, 2018 at 11:00 a.m.
Objection Deadline: November 26, 2018

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L.
Madoff Investment Securities LLC and Bernard L.
Madoff,

Plaintiff,

v.

BAM L.P., MICHAEL MANN, and MERYL
MANN,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04390 (SMB)

NOTICE OF TRUSTEE'S MOTIONS *IN LIMINE* NUMBERS 1 AND 2

PLEASE TAKE NOTICE THAT Irving H. Picard, as trustee (“Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.*, and the estate of Bernard L. Madoff (“Madoff”) (collectively, “Debtor”), by and through his undersigned counsel, will move before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004, on **December 3, 2018 at 11:00 a.m.**, or as soon thereafter as counsel may be heard, for entry of orders relating to trial in the above-referenced adversary proceeding on: (1) Trustee’s Motion *in Limine* Number 1 To Admit the Plea Allocutions of Bernard L. Madoff and BLMIS Employees; and (2) Trustee’s Motion *in Limine* Number 2 to Confirm All Requests For Admission As Deemed Admitted (the “Motions”), and upon the Declaration of Dean D. Hunt in Support of the Motions. Proposed orders are attached hereto as Exhibits 1 and 2.

PLEASE TAKE FURTHER NOTICE that written objections to the Motions must be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004 by **November 28, 2018** (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein) and must be served upon (a) Baker & Hostetler LLP, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan; and (b) Securities Investor Protection Corporation, 1667 K Street, N.W., Suite 10, Washington, DC 20006, Attn: Kevin Bell. Any objections must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection to the Motions.

PLEASE TAKE FURTHER NOTICE that failure to file timely objections may result in the entry of an order granting the relief requested in the Motions without further notice to any party or an opportunity to be heard.

Dated: New York, New York
November 19, 2018

By: /s/ Dean D. Hunt

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Email: dsheehan@bakerlaw.com
Dean D. Hunt
Email: dhunt@bakerlaw.com
Lan Hoang
Email: lhoang@bakerlaw.com
Seanna R. Brown
Email: sbrown@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
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